

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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KEVIN DE LA CRUZ and ANTHONY
TABAS,

Plaintiffs,

22-cv-03053 (SN)

-against-

NOTICE OF MOTION

MDBH MOBILE 3 INC., MRBH MOBILE
INC., MDBH MOBILE 7 INC., MDBH
MOBILE INC., CELL PHONES OF
HARLEM, INC., HIGH SPEED WIRELESS
1618, INC., GH WIRELESS II, INC., and
MORIS HASBANI,

Defendants.

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PLEASE TAKE NOTICE, Plaintiffs, KEVIN DE LA CRUZ and ANTHONY TABAS (collectively, "Plaintiffs"), by and through their attorneys, THE NHG LAW GROUP, P.C., will move this Court before the Honorable Sarah Netburn, United States Magistrate Judge, United States District Court for the Southern District of New York, located at 40 Foley Square, New York, New York 10007 at the earliest date and time available to this Court so that counsel may be heard for an Order granting Plaintiffs' Motion for Summary Judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure against Defendants, MDBH MOBILE 3 INC., MRBH MOBILE INC., MDBH MOBILE 7 INC., MDBH MOBILE INC., CELL PHONES OF HARLEM, INC., HIGH SPEED WIRELESS 1618, INC., GH WIRELESS II, INC., and MORIS HASBANI.

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This Motion is based on Plaintiffs' accompanying Memorandum of Law, Plaintiffs' Local Civil Rule 56.1 Statement of Undisputed Facts, and the Declaration of Victoria Spagnolo, Esq. and the Exhibits attached thereto.

Dated: Massapequa, New York
June 26, 2023

THE NHG LAW GROUP, P.C.

Victoria Spagnolo

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